



DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR QUALITY



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Certified Mail

September 23, 1996

DAQC-1645-96

Craig N. Thatcher
Thatcher Chemical Company
P.O. Box 27407
1905 Fortune Road
Salt Lake City, Utah 84127

Dear Mr. Thatcher:

Re: Thatcher Chemical Company - Letter of Response to ORDER TO TEST (DAQC-1324-96) -
Salt Lake County

The Division of Air Quality (DAQ) has received Thatcher Chemical Company's response letter to the ORDER TO TEST dated September 6, 1996.

The September 6, 1996, ORDER TO TEST required Thatcher Chemical Company to submit a Pretest Protocol prior to conducting the testing. The DAQ must approve the Pretest Protocol and be given the opportunity to observe the test. The protocol and data report for the testing conducted during the period of August 20 - 29, 1996, do not fulfill the requirements of the September 6, 1996, ORDER TO TEST.

A Pretest Protocol is now overdue and Thatcher Chemical Company must submit a Pretest Protocol to the Executive Secretary immediately upon receipt of this letter and must also determine the sulfur dioxide emissions from the SO2 scrubber stack using EPA Reference Method 6 within the time frame specified in the ORDER TO TEST. Failure to submit a Pretest Protocol immediately and/or conduct the required testing within the time frame specified above may result in a violation of the September 6, 1996, ORDER TO TEST.

Attached is a checklist of information that is required in a Pretest Protocol. Questions regarding this matter may be directed to Jay Morris at (801) 536-4079.

Sincerely,

Ursula K. Trueman

Ursula K. Trueman, Acting Executive Secretary
Utah Air Quality Board

UKT:JPM:ts

cc: Department of Environmental Quality, Dianne R. Nielson
EPA Region VIII, Lee Hanley
Salt Lake City/County Health Department

Enclosure: Pretest Information



A.

RE: Pretest Information - SO₂ Tests

Dear _____:

The following information is necessary to insure that the compliance testings required by _____ to be performed by _____ will be done according to the quality standards established by the Utah State Department of Health. This information must be received 30 days prior to the date of initiation of testing.

1. A sketch or plans of the sample port location in the stack or duct work. The drawings must show plan view and elevation view of the sample port location such the following can be determined:
 - a. Cross section dimensions of stack or duct at the sample site.
 - b. Distance from the sample port location to the nearest upstream flow disturbance.
 - c. Distance from the sample port location to the nearest downstream flow disturbance.
 - d. Nature of the nearest upstream and downstream flow disturbance (i.e., bend in duct work, top of stack, damper, etc.).
 - e. If nearest flow disturbances are caused by bends in the duct work, the plane of the bend must be shown.
 - f. Any potential cause of cyclonic flow should be shown or mentioned.
2. List all instrumentation available to record the operating parameters of the process during the test. Indicate which parameters will be recorded during the test, along with proposed method and frequency of recording
3. List the ranges of the above parameters during normal process operation.
4. State the production rate at which the process will be operated during the test.
5. Does this source emit any ammonia, water soluble cations, or fluorides? If so, in what concentration?
6. Are there any potential hazardous conditions (i.e., chemicals, moving equipment, etc.) associated with the source to be tested? Are scaffold and pathways leading to the stack OSHA approved?
7. State the name(s) of the person(s) responsible for submittal of the preliminary results and the final test report to the Executive Secretary, Utah Air Conservation Committee. Specify the date by which the preliminary results and the final report will be submitted.

The following information should be obtained from the persons who will perform the test:

1. What method will be used to determine the dry molecular weight of the gas stream to be sampled? If a method other than EPA Method 3 is proposed, give justification for use of the alternative method.
2. What method will be used to determine the moisture content of the gas stream to be sampled? If a method other than EPA Method 4 or 5 is proposed, give justification for use of the alternative method.
3. What method will be used to determine the velocity of the gas stream to be sampled? If a method other than EPA Method 2 is proposed, give justification use of the alternative procedure.
4. If Method 2 is to be used, what type of pitot tube will be used? What is calibration coefficient of the pitot to be used? What type of differential pressure gauge will be used to measure the velocity pressure head of the gas stream to be sampled? What is the magnitude of pressure between the zero mark and the first mark on the indicating scale?
5. What method will be used to measure barometric pressure during the test? If an airport or weather service station barometer is to be used, give its location and evaluation. Give elevation of source above/below and distance from airport or weather station.
6. Please submit the most recent calibration data for the following equipment, with date of calibration:
 - a. Temperature sensor
 - b. Balance calibration
 - c. Flask calibration
 - d. Optimum wave length
 - e. Analytical balance
7. Of what material will the sampling probe liner be constructed?
8. Where will sample recovery and laboratory work be conducted?
9. Will the standard Method 6 be used, one of the modifications of Paragraph 2.1, Method 6, or will Method 6A be used?
10. Does the dionized water to be used conform to ASTM Specification D1193-74 Type 3? will KMnO_4 test be omitted?
11. When will the H_2O_2 be prepared?
12. When will the Barium Perchlorate be standardized?